

EXHIBIT A

Brian T. Fox, Principal

RANGE OF EXPERIENCE

Brian Fox is a Principal at PwC leading the Computer Forensics, E-Discovery and Cybercrime lab in PwC's flagship New York office. He has over 16 years of experience in computer forensic investigations, specializing in forensic preservation, e-discovery and litigation consulting for large corporate clients. Mr. Fox has been retained by numerous Fortune 500 corporations to assist with complex civil and criminal matters, particularly with regard to privacy, security breaches, fraud, theft of trade secrets, spoliation, document revision analysis, and inventory management. He has extensive experience leading and conducting computer forensic investigations in a variety of legal contexts.

Mr. Fox is also a leading consultant in the area of Discovery Readiness, and has assisted clients across industries to develop repeatable, defensible internal discovery processes. Areas in which he has consulted include forensic preservation, discovery documentation, legal hold process development, discovery governance, technology tool analysis and implementation, data classification, records retention and management, vendor analysis, and other areas of legal and regulatory response. Mr. Fox has also been instrumental in the development of PwC's Target Operating Model for internal discovery processes.

Mr. Fox has been a speaker at numerous major law firms, corporations and government entities, including the United States Secret Service, discussing the role of computer technology and its applications in discovery. Fox has also been retained in a consultative capacity to analyze electronic inventory systems, map data flow, and interview technical witnesses on behalf of attorneys. Fox has been deposed, appointed Officer of the Court, and has assisted counsel at trial in the capacity of computer expert.

PROFESSIONAL AND BUSINESS HISTORY

PricewaterhouseCoopers LLP: 2006 - present

Responsible for computer forensics investigations, e-discovery, privacy breach investigations and discovery readiness consulting in New York. Directly supervise staff of 10 consultants. Responsible for national Computer Forensics training and co-leader of the national Information Risk Management practice, including Discovery Readiness and Records & Information Management.

Principal, July 2013 to present

Director, September 2008 to July 2013

Manager, March 2006 to August 2008

Computer Discovery Labs, Inc.: 1998-2006

Responsible for computer forensic investigations for legal and insurance clients. Responsible for primary business development, management of forensics staff, scoping and executing projects, and financial management of the business.

Partner, March 2005 to March 2006

Director of Forensics, April 2003 to March 2005

Senior Forensic Engineer, April 1998 - April 2003

Superior Bag Mfg. Corp.: 1995-2006

Regional Sales Manager, October 2000 - February 2006

Network Administrator / Lead Database Developer, June 1996 - September 2000

Customer Service Representative, December 1995 - February 1996

HIGHLIGHTS OF PROFESSIONAL AND BUSINESS EXPERIENCE

- Investigated a trade secret theft case for a European manufacturer. Acquired evidence, performed forensic analysis of hard drives and e-mail content to determine the movement of proprietary files and associated dates and times. Prepared expert report.
- Investigated a trade secret theft case for a Northeastern manufacturer. Acquired evidence, performed forensic analysis of hard drives and e-mail content to determine the movement of key files from company-owned servers to the suspects' laptops and ultimately to a competitor's network. Prepared extensive report and was named testifying expert.
- Investigated a cybercrime attack at a Fortune 100 financial services company. Conducted breach indicator assessments, forensic acquisition of affected systems, log collection and analysis, assessed application vulnerabilities, designed and executed forensic analysis strategy, and prepared forensic report for senior management.
- Investigated a privacy breach at a major financial services company. Collected evidence from endpoints, logs, applications, cloud providers, interviews and relevant IDS and proxy servers. Performed highly technical forensic analysis to assess reach and impact of attack. Assessed breach vectors, identified affected parties, performed data analysis to de-duplicate, subdivide and analyze populations of affected parties for preparation of relevant disclosure notices
- Led e-discovery effort for major professional services firm with over 200 custodians, multiple law firms and a global footprint. Managed team of 20 in forensic acquisition, processing, hosting and review. Assisted with the preparation of a 30(b)(6) witness both before and during deposition.
- Investigated a privacy breach incident for a major consumer products company. Executed incident response plan, including forensic preservation, investigative triage, data consolidation and analysis to determine scope of exposed persons, and detailed categorization of exposed data by content type. Consulted on appropriate remediation measures, and assisted the client in preparing its response to numerous federal and state inquiries. Led the data capture and analysis component of a nationwide counterfeit product seizure, leading a team of 40 across the United States in the identification, preservation and documentation of electronic data related to the matter. Participated in federal court hearings and assisted counsel in discussion of the seizure scope and rules of engagement. Led the effort to analyze over 25 terabytes of data, including e-mail, file server data, accounting systems, engineering diagrams and other data.
- Investigated a major privacy breach at a large public university. Coordinated numerous stakeholders across departments, performed forensic triage on affected systems, interviewed key response personnel and documented findings. Reviewed the university's incident response practices and provided guidance on numerous aspects of their legal, technical and operational response to the matter.
- Investigated a major privacy breach at a Fortune 50 client, including coordinating internal and external forensic investigations resources, preparation of reports for public release, and quantification of the exposure for the purposes of remediation.
- Managed major subpoena response effort for large financial services company. Directed staff of 42 over eight work streams to document, inventory and preserve all electronically stored information assets owned by the client. Drafted detailed interrogatory responses to the

Department of Justice and the Securities and Exchange Commission. Work streams included forensic preservation, forensic analysis, transactional data preservation, backup tape audit, e-discovery processing, review and production, vendor qualification, and data flow mapping.

- Consulted for major Fortune 100 client in the development of a comprehensive incident response, discovery process, and legal hold process, assisting in the hiring of staff, development of business processes, acquisition and deployment of enterprise-wide technology tools, and development of company-wide policies and procedures.
- Led data analytics team to assist a state Attorney General in the analysis of payroll data in support of the prosecution of a construction contractor in a major prevailing wage matter. Combined data from numerous sources and forms into a single MS Access database to perform analytics and determine underpayment amounts based on client-specified parameters, including forensic images, databases, spreadsheets, and hard copy paper. Managed qualification and subsequent retainer of scanning and coding vendors. Project culminated in the largest judgment in the history of our client's bureau.
- Managed investigation involving the revision history of a key document in a major toxic tort litigation. Conducted covert forensic triage at three geographic locations, managed acquisition teams, oversaw chain-of-custody and documentation. Developed and executed strategy for extracting copies of key document from 50 computer workstations, 3 servers and 21 backup tapes. Authored report, acted in capacity of Officer of the Court for a State Superior Court.
- Acted in the capacity of computer technology expert on behalf of a Fortune 500 insurance corporation in an accounting malpractice litigation. Interviewed programmers and database administrators for the client's insured in order to map out the workflow of a proprietary ERP system, and validate the output of certain paper reports. Assisted in trial preparation and at trial in the cross-examination of technical witnesses.
- Audited the computer forensic work of an opposing expert in a trade secrets litigation for a major medical corporation in the Pacific Northwest. Reviewed processes and procedures, authored report detailing deficient practices and potential issues, consulted with Superior Court judge on the suitability of retained experts.
- Conducted examination of computer systems in a criminal defense matter in the State of Alabama. Reviewed law enforcement's forensic work, performed extensive examination of computer system, consulted on the mitigating factors of operating system behavior with regard to the location of contraband files.
- Authored, deployed and maintained two inventory control database systems for two manufacturing corporations using 4D, a front-end/back-end client-server database platform.
- Designed, deployed, and managed 50-user wide area network in the capacity of Network Administrator. Network included Windows, Mac OS, and Cisco devices in four geographic locations.

EDUCATION AND CERTIFICATIONS

Whitman College, Bachelor of Arts, May 1992

EnCase Certified Examiner, Guidance Software, July 2005 – present

TECHNOLOGY CAPABILITIES

- Expert in the functionality of Windows operating systems, from Windows for Workgroups

through Windows 7, including server versions

- Expert in network administration and topology, Microsoft Exchange and Lotus Notes administration, and Active Directory environments
- Expert in EnCase, FTK and numerous other computer forensic software tools
- Extensive e-discovery processing and review experience, including specific experience with Wave Trident, dtSearch, Concordance, Outindex, iCONNECTxt/ext, Stratify, and Relativity
- Extensive experience with legal hold tools and technologies, including PSS Atlas, Exterro, Autonomy and other tools
- Extensive experience with archiving and ECM technologies, including Symantec Enterprise Vault, OpenText, FileNet, Documentum, and others
- Expert 4D programmer and database developer
- MS Access, MS SQL Server, Oracle 10g
- Experienced investigator in UNIX and Linux environments
- Expert in PC and server hardware
- TCP/IP, Cisco IOS and other network traffic analysis
- Privacy Breach and Network intrusion investigations

FOREIGN LANGUAGE CAPABILITIES

French (moderate proficiency)

TESTIMONY EXPERIENCE

January 2015, *Chefs Diet Acquisition Corp. d/b/a Chefs Diet v. Lean Chefs, LLC, Nicholas Zazza and Arthur Gunning*, affidavit

August 2005, *Crockett, et al., v. Second Chance, Inc.* deposition

EXHIBIT B

Deletion Count by Month

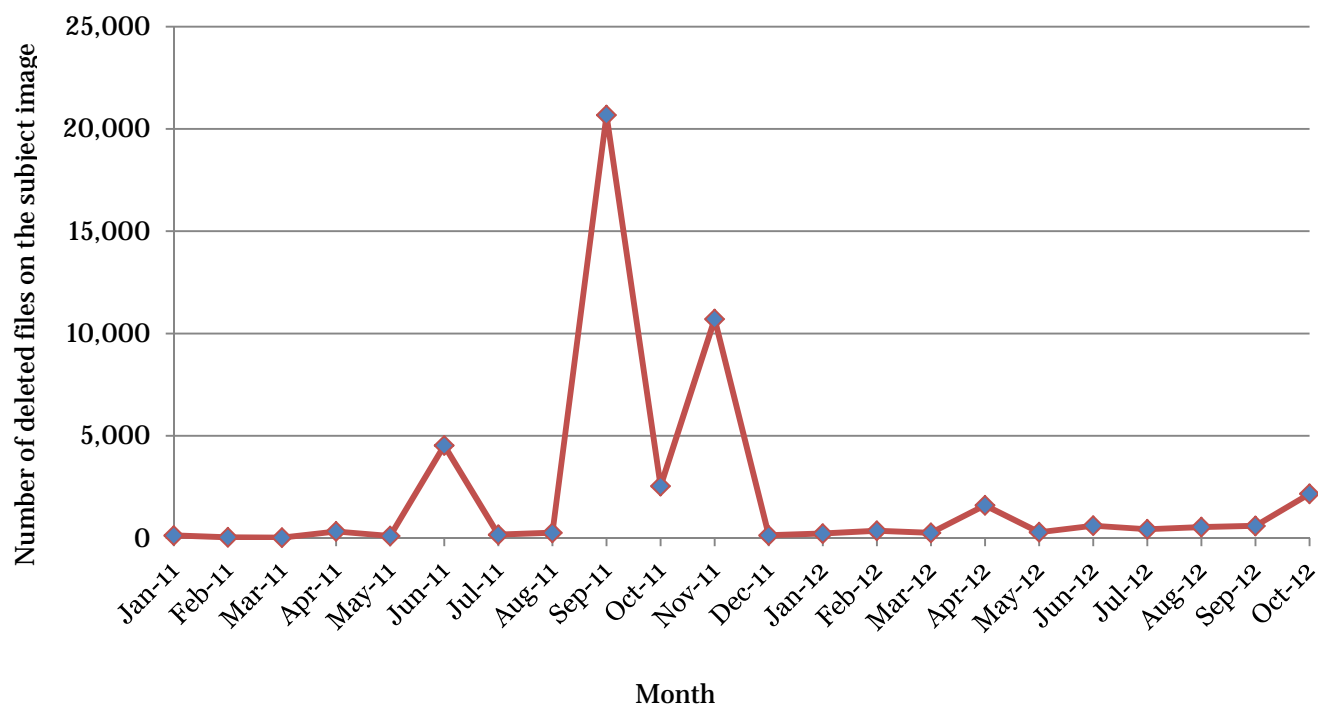


EXHIBIT C

Deleted QuickBooks Files by Date

